IN THE UNITED STATE DISTRICT COURT EASTERN DISTRICT OF NEW YORK

ODILON S. CELESTIN, WIDMIR ROMELIEN, MARIE LUCIE ST VIL, GORETTEIE ST VIL, JEANNETTE VALEUS, GUETTY FELN, HERVE COHEN, and on behalf of all others Similarly situated,

Plaintiffs,

Case No. 18 cv-7340 (LDH) (PK) ECF CASE

-against-

MICHEL JOSEPH MARTELLY, JOCELERME PRIVERT, JOVENEL MOISE, THE WESTERN UNION COMPANY, d/b/a Western Union Holdings, Inc., Western Union Financial Services, Inc., and through other subsidiaries and affiliates, CARRIBEAN AIR MAIL, INC., d/b/a CAM, UNIBANK, S.A., UNITRANSFER USA, INC., UNIGESTION HOLDING, S.A. d/b/a DIGICEL HAITI, NATCOM S.A., and THE GOVERNMENT OF HAITI,

Defendants

DECLARATION OF MARCEL DENIS

Marcel Denis declares under penalty of perjury, pursuant to 28 U.S.C. 1746 that the following is true:

- 1. I am an attorney duly admitted to practice law in the state of New York and I am the managing partner of Denis Law Group, PLLC.
- 2. I submit this declaration in support of Plaintiffs' opposition to Defendants motion to dismiss Plaintiffs second amended complaint.
- 3. Attached hereto as Plaintiff's Exhibit A, is a copy of video footage of Defendant Michel Joseph Martelly and Denis Obrien, CEO of Unigestion Holding S.A. d/b/a Digicel Haiti addressing the collection of fees prior to Martelly becoming president.

4. Attached hereto as Plaintiff's Exhibit B, is a copy of video footage of Defendant Martelly at a press conference addressing questions regarding the legality of the fees being collected.

5. Attached hereto as Plaintiff's Exhibit C, is a copy of the Presidential Order with translation.

6. Attached hereto as Plaintiff's Exhibit D, is copy of Circurlars 7 & 98 with translation.

7. Attached hereto as Plaintiff's Exhibit E, is a copy of money transfer receipts.

8. Attached hereto as Plaintiff's Exhibit F, is a copy of video footage of Defendant Martelly being interviewed regarding the failures of the funding of education with the collected fees.

9. Attached hereto as Plaintiff's Exhibit G, is video football of Defendant Martelly answering questions regarding the concerns of the illegality of the fees collected while he was president.

10. Attached hereto as Plaintiff's Exhibit H, is video footage of a member of the Haitian government answering questions regarding the amounts of money collected.

11. Attached hereto as Plaintiff's Exhibit I, is video footage of Defendant Jovenel Moise answering questions regarding the collection of fees and the use of the fees collected.

Dated: Brooklyn, New York June 12, 2019

Marcel Denis

EXHIBIT A

VIDEO INTERVIEW FOOTAGE OF DEFENDANTS MARTELLY AND DIGICEL

EXHIBIT B

Translation Transcript

The next question is from Radio Vision 2000. (This is an excerpt from a filmed press conference that is about 13 minutes and 15 seconds long. The excerpt starts at 0:5:26)

AJ: Good morning Mr. President.

MM: Good Morning.

AJ: My name is Advenide Joseph and I work for Vision 2000. My question relates to Education. We learned that you intend to levy taxes on money transfer coming from abroad together with international calls in favor of education. I would like to know whether you spoke to the diaspora about your intention and whether you already contacted the phone companies in Haiti?

MM: What companies?

AJ: The representatives of the phone companies in Haiti, and finally, do you think you are proposing is possible without the enactment of law calling for such imposition? Thank you.

MM: Well, I am glad you spoke about the law. I am the elected president who is about to take office to champion the cause of the people and often time, when something must be done to benefit the general population, we will find the means and ways to get it done. That is the mandate they gave me, to defend their interest. We will use the law and we will go through the parliament of course, but we will commence the debate for the population to receive what they are looking for. That is why I am here. We came up with the idea, we worked on it and it is already finalized.

MM: Pursuant to the phone companies, we have decided to take USD 0.05 per minute on all incoming phone calls because we do not want the people of Haiti to suffer from the increase and do not want them to pay for it, even though, they are the ones who are going to benefit from the education; we created a way so that only the people with means, those who are well to do are the ones who are going to pay that money. Meaning we are going to collect the USD0.05 from people abroad who are calling Haiti. When we calculate the volume of calls Haiti receives every month, we are going to generate 3.5 million dollars every month for education. We already met with the phone companies, I told you that already. We have work to do; in fact, they are trying to delay us, but that will not deter us from working. We may not implement the measures yet, but we are working. We spoke with Digicel already, and they agreed. We spoke with Haitel already, and they agreed. We spoke with the representatives of Voila, who reside abroad, and they agreed. Matter of fact, they even proposed that we started with the collection since the 1st of May. Unfortunately, as elected president who is yet to be sworn in, I cannot enforce the laws yet and time is needed to put the structure in place, the mechanism, it will take us another month. This is something that will take effect on the first of June.

MM: As for the Money Transfer Operators, once again, we will ask them, have we spoken with them already? The plan for Money Transfer Operators, we took care of the part dealing with the

phone companies, the plan for the Money Transfer Companies is that for everyone who is sending money, I must tell you that nobody knows how much money the Money Transfer Companies make per year. We are not here to disturb them from making their money, they can make their money. But to send our children to school free of charge, we believe that we have the right to request that they give us a dollar on every money transfer to go directly into the education fund's account. That one dollar, when you multiply it by the total amount of transfer per month, we will generate 5 million dollars. That makes already 8.5 million dollars per month that we have identified through those two avenues. 8.5 million dollars, which is nothing, because we are talking about sending 500,000 children who are not in school and we need to send them to school. That is just the beginning. Do not forget that we said free schooling for everyone, of course in due time, at another time, we will address that. But for now, our preoccupation is with the children who are on the street and not in school, we do not want that. We must give them the means and ways for them to go to school. I also spoke about imposing a tax on the lottery. Once again, you all know what I am about to say here, we know that people running numbers/lottery make money, but nobody knows how much money they make. That industry is not structured, and we are going to organize it, so we can tax it to add to the education fund. I do not think that these measures are unpopular because we are asking a few people to participate in something that will benefit their own child, Haiti. It is imperative that we do it, to answer to the lady's question, we are forging ahead. We intend to put in place a national lottery where all profit will go to the education fund. Do not forget that my campaign promise to the mass was that I would send them to school. I am a man of my word. I have never failed to keep my promises, I must send them to school. Therefore, be prepared. I think that you have only one choice, you could have had another choice, that is stand against me. However, you would not be going against me because my children are enrolled in school. You would be going against the masses. I am asking you for your support and for you to understand the need to send the poor children to school because ignorance is the main vector upon which poverty hinges in a country. Every uneducated person can come and ask me for a job, I will give them a job; but what kind of job would I give them? Wash my car, plant this tree? As such, they would always have a few coins in their pockets just to eat but they would never have a real job commensurate with a proper salary. We, in Haiti, do not understand that; elsewhere in the world, before you major in a field, they tell you how much money you will make upon graduation. You must be able to give the people of Haiti that choice as well. Especially when given the chance, we, Haitian, excel. Thus, why are we suffocating the children by not giving them the opportunity. That is fight that I have taken. I would like for you to help make easy by supporting me in such endeavor.

AJ: Is that possible without a law?

MM: I believe it is possible with a Presidential Order. Once again, in defense of the nation's interest and that of the general population, I will use all the powers that I have as the supreme chief of the nation for the betterment of the people.

CERTIFICATION

I, Daniel Dume-Charles, hereby certify that I translated the attached document from Haitian into English and that, to the best of my ability, it is a true and correct translation. I further certify that I am competent in both French and English to render and certify such translation,

Daniel Dume-Charles, Translator

Sworn to before me this 7th day of June 2019.

Notary Public

MARCEL P. DENIS
NOTARY PUBLIC, STATE OF NEW YORK
Registration No. 02DE6365279
Qualified in Kings County
Commission Expires October 2, 2021

EXHIBIT C

LIBERTY

EQUALITY

FRATERNITY

PRESIDENTIAL ORDER

MICHEL JOSEPH MARTELLY

PRESIDENT

According to articles 136, 137-1, 142, 150, 160, 162, 163 of the Constitution;

According to the September 27, 1969 Decree creating the Conseil National des Télécommunications (CONATEL);

According to the October 12, 1977 allowing the Haitian Government to monopolize the telecommunication services;

According to the June 10, 1987 Decree redefining the functions of CONATEL;

According to the February 16, 2005 on the preparation and enforcement of the laws of Finance;

According to the May 17, 2005 Decree organizing the Government's Central Administration;

According to the November 23, 2005 establishing the administration and function of the Superior Court of Auditors and Administrative Disputes also known as CSCCA;

Whereas the October 12, 1977 Decree stipulates that tariffs and fees are set by the Executive Power upon the recommendation of CONATEL through the Secretary of State for Public Works, Transportations and Communications (hereinafter MTPTC);

Whereas article 40.6 of the May 17, 2005 Decree organizing the Government's Central Administration allows the Prime Minister to expressly delegate his powers to a Minister and said Minister alone may fix telecommunication tariff through the enactment of regulatory measures (communiqués, circulars, or orders) based on the proposition of CONATEL;

Based on the report of the Minister of Public Works, Transportation, and Communications,

ORDER

- Article 1.- The price floor for incoming international calls is set at twenty-three cents in United States currency (USD 0.23) per minute.
- Article 2.- Of the United States twenty-three cents (USD 0.23), five United States cents (USD 0.05) will be paid to the Haitian Government by the operators through the Conseil National des Télécommunications;
- Article 3.- The Conseil National des Télécommunications may deduct from said amount costs relating to putting in place a telephone fraud prevention system and to deposit the balance thereof into a special account designed for such use.

Article 4.- The present order will be duly published and implemented by the Minister of Public Works, Transportation and Communications.

Issued in Port-au-Prince, September 9, 2011 on the 208th year of Independence.

Signed by

President

Michel Joseph MARTELLY

Prime-Minister

Joseph Jean-Max BELLERIVE

Minister of Public Works, Transportation, and Communications Jaques GABRIEL

CERTIFCATION

I, Daniel Dume-Charles, hereby certify that I translated the attached document from French into English and that, to the best of my ability, it is a true and correct translation. I further certify that I am competent in both French and English to render and certify such translation.

Daniel Dume-Charles, Translator

Sworn to before me this 7th day of June 2019.

Notary Public

MARCEL P. DENIS

NOTARY PUBLIC, STATE OF NEW YORK

NOTARY PUBLIC, STATE OF NEW YORK

Qualified in Kings County

Commission Expires October 2, 2021

7

LIBERTÉ

ÉGALITÉ RÉPUBLIQUE D'HAÏTI

FRATERNITÉ

ARRÊTÉ

MICHEL JOSEPH MARTELLY PRÉSIDENT

Vu les Articles 136, 137-1, 142, 150, 159, 160, 162, 163 de la Constitution;

Vu le Décret en date du 27 septembre 1969 créant le Conseil National des Télécommunications (CONATEL);

Vu le Décret en date du 12 octobre 1977, donnant à l'Etat haïtien le monopole des services de télécommunications ;

Vu le Décret du 10 juin 1987 redéfinissant la mission et les attributions du CONATEL;

Vu le Décret du 16 février 2005 sur la préparation et l'exécution des Lois de Finance ;

Vu le Décret du 17 mai 2005 portant organisation de l'Administration Centrale de l'État ;

Vu le Décret du 23 novembre 2005 établissant l'organisation et le fonctionnement de la Cour Supérieure des Comptes et du Contentieux Administratif désigné sous le sigle CSCCA;

Considérant que le Décret du 12 octobre 1977 précise que les tarifs et redevances sont fixés par le Pouvoir Exécutif sur proposition du CONATEL par l'intermédiaire de la Secrétairerie d'Etat des Travaux Publics, Transports et Communications (ci-après MTPTC);

Considérant que l'article 40.6 du Décret du 17 mai 2005 portant organisation de l'Administration Centrale de l'Etat prescrit que par délégation expresse du Premier Ministre, le ministre peut à lui seul fixer le tarif sur les télécommunications par des mesures réglementaires (communiqué, circulaire ou Arrêté) sur proposition du CONATEL;

Sur le rapport du Ministre des Travaux Publics, Transports et Communications,

ARRÊTE

- Article 1.- Le prix plancher des appels entrants internationaux est fixé à vingt-trois centimes de dollar américain (USD 0.23) à la minute.
- Article 2.- De ces vingt-trois centimes de dollar américain (USD 0.23) cinq centimes de dollar américain (USD 0.05) seront versés par les opérateurs à l'Etat Haïtien via le Conseil National des Télécommunications :
- Article 3.- Le Conseil National des Télécommunications pourra déduire de ces fonds des frais relatifs à la mise en place des mécanismes de lutte contre les fraudes téléphoniques et déposer la balance sur un compte spécial créé à cet effet.
- Article 4.- Le présent Arrêté sera publié et exécuté à la diligence du Ministre des Travaux Publics, Transports et Communications.

Donné à Port-au-Prince, le 9 septembre 2011, An 208^è de l'Indépendance.

Par le Président :

Michel Joseph MARTELLY

Le Premier Ministre:

Joseph Jean-Max BELLERIVE

Le Ministre des Travaux Publics, Transports et Communications

Jacques GABRIEL

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EXHIBIT D

Bank of the Republic of Haiti CIRCULAR № 98

TO COMMERCIAL BANKS, SAVING AND MORTGAGE BANKS AND MONEY TRANSFER AGENCIES

To maintain the efficiency, integrity, the viability of information and to secure the system of payments while promoting financial inclusion, the BRH has decided to initiative a system reform that aims at:

- Broadening the range of instruments and payment services;
- Accelerating the dematerialization of money and financial inclusion;
- Promoting decentralization and payment sites;
- Enhancing operating costs and the use of cash and facilitate access to such payment services;
- Reinforcing the interoperability of banking and payments infrastructures;
- Establishing a more appropriate regulatory and surveillance system;
- Increasing the efficiency and stability of payment services.

In keeping with the banking law enacted on August 17, 1979 creating the Bank of the Republic of Haiti, the November 4, 1980 Decree regulating all banking transactions and the July 6, 1989 Decree regulating transfer agencies, the present circular establishes the ways and means all international transfers are effectuated to and from Haiti.

1. Reporting of International Transfers

All commercial banks, saving and mortgage banks, and transfer agencies must file paper report with BRH every Monday detailing the total number of transfers effectuated to and from Haiti, irrespective of how the beneficiary receives such transfer (in kind or cash), in keeping with the attached reporting form. These institutions are also obligated to file monthly with BRH a certified copy of the total amounts filed with the regulatory body of the territories where they are licensed to operate as Money Transfer Operators.

Any institution that fails to adhere to the present requirements will be subjected to the following penalties:

- Reliability of the information

At all times, the amounts reported in the attached form must mirror the amounts that appear in the relevant institutions books and the reports filed with the aforementioned regulatory bodies. If the amounts reported do not match, the BRH may, after investigating the nature and the circumstances

of the violation, impose a penalty equivalent to 50% of the difference between the declared amounts and the amounts appearing in the books, in addition to the user fees due and owing by the violating institution.

For all subsequent violation, the BRH may apply sanction that includes revocation of the operating permit or license.

- Late filings

Failure to file timely reports as required, will subject the noncomplying institutions to a daily fine of ten thousand gourdes (HTG 10,000.00). The penalty period begins to run from the day that BRH was supposed to receive the reports until the day it receives them.

The fine will double for any filings that are more than eight days late. The BRH may apply sanction that includes revocation of the operating permit or license for any late filings that are more than a month late.

Penalty Payments

BRH will communicate a notice, with signed return receipt, to the relevant institutions detailing the amount of penalties to be paid. Penalty fees must be paid by certified checks only made to the order of Banque de la Republique d'Haiti within eight (8) days from the date of receipt of the notice.

- Inspection

Inspections may be held at any time to implement the present.

2. Usage and user fees of the BRH's payment platform.

Commercial banks, saving and mortgage banks, and transfer agencies are required to use BRH's payment platform for all money transfer going from and to Haiti. They are also required to offer to their clients the option to receive money transfers through universally accepted electronic payment methods.

BRH will provide the mechanisms for data exchange, execution, compensation, and regulation of the payment platform relating to all international transfers in and out of Haiti.

Testing, certification, user and inspection fees in the amount of \$1.50 will apply on every transaction for payment services and access at various points throughout the country. Such fees are payable monthly and must be paid before the 10th of each month with cashier check.

Furthermore, said fees will not apply against transfers effectuated by banks for their own account. In other words, transfers effectuated for the benefit of businesses and individuals are covered by such fees.

3. Interface to BRH's Platform

BRH will establish by means of regulatory provisions the deadline for the implementation of the interfaces to its payment platform.

The present circular shall take effect on June 1st, 2011.

Port-au-Prince, May 20, 2011.

Charles Castel Governor

ATTACHED- Report form

CERTIFICATION

I, Daniel Dume-Charles, hereby certify that I translated the attached document from French into English and that, to the best of my ability, it is a true and correct translation. I further certify that I am competent in both French and English to render and certify such translation.

Daniel Dume-Charles, Translator

Sworn to before me this 7th day of June 2019.

Notary Public

MARCEL P. DLAN
MARCEL P. DLAN
NOTARY PUBLIC, STATE OF NEW YORK
NOTARY PUBLIC, STATE OF NEW YORK
NOTARY PUBLIC, STATE OF NEW YORK
Qualified in Kings County
Commission Expires October 2, 2021

Bank of the Republic of Haiti The Governor

LETTER-CIRCULAR #7

LETTER-CIRCULAIRE TO COMMERCIAL BANKS, SAVING AND MORTGAGE BANKS AND MONEY TRANSFER AGENCIES

Following the issuance of circular 98 and how it applies to international money transfers to and from Haiti together with the meetings held on Friday May 27, 2011 and Tuesday May 31, 2011, the Bank of the Republic of Haiti (BRH) hereby reaffirms to all commercial banks, saving and mortgage banks, and money transfer agencies, the following:

1. Usage and user fees of the BRH's payment platform

Testing, certification, user and inspection fees in the amount of \$1.50 must be collected in compliance with the rules currently being used by the institutions covered under the present circular. The fees will be collected at the source from all money transfer sent and received (cash or in kind) from overseas.

These fees shall not be taken in account when calculating the turnover tax (TCA)

2. Effective date

Beginning June 15, 2011, circular 98 shall apply to all international transfer (to and from, in cash or in kind) carried out from the following geographical zones:

- 1. The United States of America;
- 2. Canada;
- 3. Turks and Caicos,
- 4. Bahamas.

Beginning July 1st, 2011, all commercials banks, saving and mortgage banks, and all money transfer operators must report every international transfer effectuated (to and from) Haiti regardless of how its intended beneficiary is to receive it (cash or in kind).

Port-au-Prince, May 31, 2011.

Charles Castel

CERTIFICATION

I, Daniel Dume-Charles, hereby certify that I translated the attached document from French into English and that, to the best of my ability, it is a true and correct translation. I further certify that I am competent in both French and English to render and certify such translation.

Daniel Dume-Charles, Translator

Sworn to before me this 7th day of June 2019.

Notary Public

MARCEL P. DENIS

NOTARY PUBLIC, STATE OF NEW YORK

Registration No. 02DE6365279

Qualified in Kings County

Qualified in Kings County

Commission Expires October 2, 2021

APPENDIX

For the period of Cash Transfers INSTALLMENT < 50 50>100 100>500	NUMBER OF TRANSFERS	AMOUNT PER INSTALLMENT	FEES PER INSTALLMENT
<50 50>100 100>500	The second recognition and processes		
50>100 100>500			
100>500			
500>1,000			
1,000 and more			
TOTAL			
<50			
<50			
50 > 100			
100 >500			
500 > 1,000			
1,000 and more			

Banque de la République d'Haïti CIRCULAIRE N° 98

AUX BANQUES COMMERCIALES, AUX BANQUES D'EPARGNE ET DE LOGEMENT ET AUX MAISONS DE TRANSFERTS

Dans le cadre de ses efforts pour maintenir l'efficience, l'intégrité, la fiabilité des informations et la sécurité du système de paiements aussi bien que pour promouvoir l'inclusion financière, la BRH a décidé d'initier une réforme qui vise à :

- élargir la gamme des instruments et services de paiement ;
- accélérer la dématérialisation de la monnaie et l'inclusion financière ;
- promouvoir la décentralisation et la vulgarisation des points de paiement;
- améliorer les coûts d'exploitation et d'utilisation des liquidités ainsi que l'accès à ces moyens de paiement;
- renforcer l'interopérabilité des infrastructures bancaires et de paiement;
- mettre en œuvre un régime de surveillance et de règlementation plus appropriée; et
- accroitre l'efficience et la stabilité des services de paiement.

Conformément aux dispositions de la loi du 17 août 1979 créant la Banque de la République d'Haïti, du décret du 14 novembre 1980 règlementant les activités bancaires et du décret du 6 juillet 1989 sur les maisons de transfert, la présente circulaire détermine les conditions d'exécution des transferts de fonds internationaux sur Haïti (entrants et sortants).

1. Déclaration de transferts internationaux

Les banques commerciales, les banques d'épargne et de logement et les maisons de transfert sont tenues de communiquer chaque lundi à la BRH, sur support papier, le nombre et le montant total des transferts expédiés à l'étranger et reçus de l'étranger, quelle que soit la forme dans laquelle le bénéficiaire reçoit le transfert (espèces ou nature), conformément au formulaire de déclaration en annexe. Ces institutions sont tenues également de faire parvenir mensuellement à la BRH la copie certifiée conforme des montants déclarés aux régulateurs des territoires sur lesquels elles exercent leurs activités de transfert de fonds.

D

En cas de non respect de la présente section, l'institution concernée s'expose aux pénalités suivantes :

Fiabilité de l'information

En tout temps, les montants déclarés dans le formulaire prévu en annexe doivent être ceux apparaissant dans les livres de l'institution ainsi que les déclarations aux régulateurs susvisés. Si les montants ne concordent pas, la BRH peut, après enquête sur les circonstances et la nature de la violation, imposer une pénalité de 50% de la différence entre les montants déclarés et les montants apparaissant dans les livres, sans préjudice des frais d'utilisation dus par l'institution.

En cas de récidive, la BRH appliquera des sanctions pouvant aller jusqu'au retrait de l'autorisation de fonctionnement.

Retard dans la soumission des rapports

En cas de retard dans la soumission du formulaire, les institutions concernées encourent une pénalité de dix mille gourdes (HTG 10,000.00) par jour d'infraction. La période de pénalité s'étend du jour où le formulaire aurait dû être transmis à la BRH au jour où celle-ci le reçoit.

Au-delà de huit (8) jours de retard, le montant de la pénalité sera doublé. Au-delà d'un (1) mois de retard, la BRH peut prendre des sanctions pouvant aller jusqu'au retrait de l'autorisation de fonctionnement.

Paiement des pénalités

La BRH fera parvenir, par avis avec accusé de réception, aux institutions concernées le montant des pénalités. Les pénalités doivent être réglées par chèque de direction à l'ordre de la Banque de la République d'Haïti dans un délai de huit (8) jours à compter de la date de réception de l'avis.

Inspection

Des inspections peuvent avoir lieu à tout moment dans le cadre de la mise en œuvre des présentes.

2. Utilisation et frais d'utilisation de la plateforme de paiement de la BRH

Les banques commerciales, les banques d'épargne et de logement et les maisons de transfert sont tenues d'utiliser la plateforme de paiement de la BRH pour le traitement de tous les transferts de fonds internationaux sur Haïti (entrants et sortants). Elles sont tenues également d'offrir à leur clientèle l'option de recevoir les transferts par des instruments de paiement électroniques universellement acceptés.

P.O. Box 1570, Port-au-Prince, Haïti. Téléphone: 2299-1244. Fax 2299-1191



Les mécanismes d'échange de données, d'exécution, de compensation et de règlement de la plateforme de paiement pour le traitement des transferts internationaux sur Haïti (entrants et sortants) seront édictés par la BRH.

Des frais de test, de certification, d'utilisation et d'inspection de 1.50 USD seront appliqués par transaction pour les services de paiement et d'accès en différents points à travers le pays. Ces frais seront facturés mensuellement et devront être payés avant le 10 de chaque mois par chèque de direction.

Par ailleurs, lesdits frais ne seront pas applicables sur les transferts effectués par les banques pour leur propre compte. Autrement dit, les transferts pour les entreprises et les particuliers sont donc visés par ces frais.

3. Interfaces avec la plateforme de la BRH

La BRH fixera par voie de dispositions règlementaires la date limite pour la mise en place des interfaces avec la plateforme de paiement.

La présente circulaire entre en vigueur le 1er juin 2011.

Port-au-Prince, le 20 mai 2011

Charles Castel

ANNEXE - Formulaire de déclaration

ANNEXE

NOM DE L'INSTITU	UTION:					
Pour la période du_		au				
Transferts en espèces						
TRANCHE	NOMBRE DE	MONTANT PAR	FRAIS PAR			
3	TRANSFERTS	TRANCHE	TRANCHE			
< 50						
50 > 100						
100 > 500						
500 > 1,000						
1,000 et plus						
TOTAL						
Transferts en nature						
TRANCHE	NOMBRE DE TRANSFERTS	MONTANT PAR TRANCHE	FRAIS PAR TRANCHE			
< 50						
50 > 100						
100 > 500						
500 > 1,000						
1,000 et plus						
TOTAL						
Date :	_					
	4					
Nom :		Nom:				
Signature autorisée:		Signature autorisée:				
Titre/Fonction:		Titre/Fonction:				
THE CIT CHOIL						

P.O. BOX 1370, POIL-ad-1 Timos, Tianai Voispinone

P.O. Box 1570, Port-au-Prince, Haïti. Téléphone: 2299-1244. Fax 2299-1191

Banque de la République d'Haïti Le Gouverneur

LETTRE-CIRCULAIRE # 07

LETTRE-CIRCULAIRE AUX BANQUES COMMERCIALES, AUX BANQUES D'EPARGNE ET DE LOGEMENT ET AUX MAISONS DE TRANSFERTS

Faisant suite à la circulaire 98 sur les conditions d'exécution des transferts internationaux sur Haïti (entrants et sortants) et aux réunions des vendredi 27 mai 2011 et mardi 31 mai 2011, la Banque de la République d'Haïti (BRH) a l'avantage de confirmer aux banques commerciales, aux banques d'épargne et de logement et aux maisons de transferts ce qui suit:

1. Utilisation et frais d'utilisation de la plateforme de paiement de la BRH

Les frais de test, de certification, d'utilisation et d'inspection de USD 1.50 doivent être prélevés conformément aux règles en usage actuellement dans les institutions visées par la présente. Les frais seront donc perçus à la source que ce soit sur les transferts expédiés à l'étranger ou sur les transferts reçus (espèces ou nature) de l'étranger.

Ces frais ne doivent pas être pris en compte lors des calculs relatifs à la taxe sur le chiffre d'affaires (TCA).

Date d'entrée en vigueur

A compter du 15 juin 2011, la circulaire 98 s'applique à tous les transferts internationaux (entrants et sortants, en espèces ou nature) effectués sur les zones géographiques suivantes :

- 1. Etats-Unis d'Amérique du Nord;
- 2. Canada;
- 3. Iles Turks et Caicos;
- 4. Bahamas.

A compter du 1^{er} juillet 2011, les banques commerciales, les banques d'épargne et de logement et les maisons de transfert sont tenues de déclarer tous les transferts internationaux sur Haïti (entrants et sortants) quelle que soit la forme dans laquelle le bénéficiaire reçoit le transfert (espèces ou nature).

Port-au-Prince, le 31 mai 2011

Charles Castel

P.O. BOX 1570, Port-au-Prince, Haiti. Téléphone: 2940-2009/ 2998-2024/ 2998-2025

EXHIBIT E



3601 SW 160TH AVE SUITE 110 MIRAMAR, FL 33027 USA Toll Free: (877) 864-8726 Phone: (954) 628-0022 www.unitransfer.com

JC-ONE STOP MULTI CENTER, INC 923 UTICA AVE BROOKLYN, NY 11203 (718) 469-1566 SubAgent License: MT104114

AGENT RECEIPT / RESI AJAN

RECEIPT NO / Nimewo Resi: 19447251

PRODUCT / PWODUI: HAITI - CASH TRANSFER
PICKUP / HTCP_USD

DONE ON / Dat: 10/NOV/2018 10:44 05 US/Eastern

DONE BY / FE PA: VV

PRINTED ON / IMPRIME LE: 10/Po: 12/8 16/44 16/41
EST

Sender / Ekspedite

ID Custome:

EROOKLYN, NY 11203 (347) 240-9085

Beneficiary / Benefisye

EMMANUEL SINVIL

PORT-AU-PRINCE

PORT-AU-PRINCE, 01

36 46 9642

Message from Sender / Mesaj Ekspedite

 Transfer Amount
 USD
 51.50

 Montan
 USD
 4.99

 Fees / Fre
 USD
 4.99

 Total Collected / Total pou peye
 USD
 56.49
 CASH

Benef. Amount / Montan
Benefisye
Fees / Fre
Net Amount / Montan Kain
Receviva
USD 51.50
-1.50
-1.50

Date available in reconsiderable sooner) / Date process
bone tou) : 10/NOV/2018

ு, iFunds may be கட்டுajan ka disponib நட

Recipient may receive less due to fees charged by the paying partner and taxes/fees levied by foreign government / Benefisye a ka resevwa mwens kob paske gen fre ak lot tax gouvenman an chage sou montan yo voye a

"" Payer Agent / Ajan Peye "
UNITRANSFER HAITI
50 RUE LAMARRE
Fillot: #ILLE 01 HAITI
28 13 040



JC MULTIPLE SERVICES
926 UTICA AVE
BROOKLYN, NY 11203
(718) 469-1566
SubAgent License: : MT1600082

AGENT RECEIPT / RESLAJAN

RECEIPT NO / Nimewo Resi

16343906

PRODUCT / PWODUL HAITI - CASH TRANSFER
PICKUP HTCP_USD

DONE ON / Dat 16/JAN/2616 10 49:55 US/Eastern

DONE BY / FE PA : VV

PRINTED ON / IMPRIME LE : 16/Jan/2016 10:49:56 AM

Sender / Ekspedite

GORETHIE ST VIL

783 LINDEN BLVD

BROOKLYN, NY 11203

(347) 240-9085

Beneficiary / Benefisye
MYRLANGE SINVIL
,PORT-AU-PRINCE, HAITI
PORT-AU-PRINCE, 01
38 82 5303

Message from Sender / Mesaj Ekspedite

 Transfer Amount / Montan
 USD
 41.50

 Fees / Fre
 USD
 4.99

 Total Collected / Total pou
 USD
 46.49
 CASH

 Benef. Amount / Montan
 USD
 41.50

 Benefisye
 Fees / Fre
 USD
 -1.50

 Net Amount / Montan Kap
 USD
 40.00

 Recevwa
 Net Amount / Montan Kap
 USD
 40.00

Date available in receiver's country (Funds may be available sooner) / Dat yo ka touche (Lajan ka disponib pi bone tou): 16/JAN/2016

Recipient may receive less due to fees charged by the paying partner and taxes/fees levied by foreign government / Benefisye a ka resevwa mwens kob paske gen fre ak lot tax gouvenman an chage sou montan yo voye a

**** Paying Agent / Ajan Peye *****
UNITRANSFER HAITI
50, RUE LAMARRE
PETION-VILLE, 01 HAITI
28 13 0451

GORETHIE ST VIL



3601 SW 160TH AVE SUITE 110 MIRAMAR, FL 33027 USA Toll Free: (877) 864-8726 Phone: **(954) 628-0022** www.unitransfer.com

LIONEL PRODUCTIONS, INC. 13740 NW 7TH AVE MIAMI, FL 33168 (305) 769-0233

SubAgent License: FT230000201

AGENT RECEIPT / RESI AJAN

RECEIPT NO / Nimewo Resi: 19717600

PRODUCT / PWODUI: HAITI - CASH TRANSFER

PICKUP / HTCP_USD

DONE ON / Dat : 28/JAN/2019 13:58:52 US/Eastern

DONE BY / FE PA : DT

PRINTED ON / IMPRIME LE : 28/Jan/2019 13:59:15 PM

EST

Sender / Ekspedite ID Customer:

ORDILON CELESTIN

13804 Nw 7th Ave
MIAMI, FL 33168
(786) 271-3210

Beneficiary / Benefisye

DESILIA CELESTIN
,
CAP-HAITIEN, 02
38 28 7618

·

301.50

Message from Sender / Mesaj Ekspedite

Transfer Amount USD
Montan
Fees / Fre USD

Fees / Fre USD 11.99
Total Collected / Total pou USD 313.49 CASH

peye





3601 SW 160TH AVE SUITE 110 MIRAMAR, FL 33027 USA Toll Free: (877) 864-8726 Phone: (954) 628-0022 www.unitransfer.com

LION EL PRODUCTIONS, INC. 13740 NW 7TH AVE MIAMI, FL 33168 (305) 769-0233

SubAgent License: FT230000201

AGENT RECEIPT / RESI AJAN

RECEIPT NO / Nimewo Resi: 19945929

PRODUCT / PWODUI: HAITI - DIRECT TRANSFER TO

UNIBANK / UNIDIRECT

DONE ON / Dat : 06/APR/2019 15:21:45 US/Eastern

DONE BY / FE PA : DT

PRINTED ON / IMPRIME LE : 06/Apr/2019 15:21:47 PM

EDT

Sender / Ekspedite

ID Customer:

ODILON CELESTIN 13804 Nw 7th Ave MIAMI, FL 33168 (786) 271-3210

, ,

Beneficiary / Benefisye

LUCNER CELESTIN

LIMBE RUE JEFRA # 9 ,LIMBE

PORT-AU-PRINCE, 01

34 86 7831

Benef. Supplier / Nimewo kont : UNIBANK

S.A, 520221612795379

Message from Sender / Mesaj Ekspedite

Transfer Amount

USD 51.50

Montan

USD 4.99

Fees / Fre

4.33

Total Collected / Total pou peye USD _

56.49 CASH

Case 1:18-cv-07340-LDH-PK Document 65-1 Filed 06/26/19 Page 30 of 53 PageID #: 710



RECEIPT

TRACKING NUMBER 38741006

Wireless Palace,Inc

13744 NW 7th Ave

MIAMI, FLORIDA USA 33168

(305) 687-4487

Date:

12/7/2017 9:16:00AM

TellerID: 7819

SENDER / EXPEDITE

RECIPIENT /MOUN KAP RESEVWA:

EXPECTED PAYOUT LOCATION/ KOTE YO KA PRAN TRANSFE A:

MIVELINE JOSEPH CASSEUS

RICHEMSON PIERRE

811 NW 118 ST

PICK UP

HAITI/AYITI

MIAMI, FL 33168 7863576100

CAP-HAITIEN, HAITI

[Pick-Up/Pikup]

31882263

12/7/2017

TRANSFER AMOUNT / KANTITE LAJAN:

DATE AVAILABLE / DAT DISPONIB:

\$36.50

TRANSFER FEES / FRÈ

\$4.99

TRANSFER TAXES / TAKS

0.00

TOTAL / TOTAL:

\$41,49

USD 1.00 = USD 1.00

TO BE PAID/ POU PEYE

EXCHANGE RATE / TO POU CHANJE LAJAN:

AMOUNT TO BE PAID / :LAJAN POU PEYE

\$US 35.00 0.00

OTHER FEES / LOT FRE: TOTAL TO RECIPIENT/ TOTAL:

\$US 35.00

C.A.M. is Licensed as a Money Transmitter by CT, DC, FL, GA, IL, MA, NJ, NY, RI, Banking Departments. License # 52117

Recipient may receive less due to fees charged by the recipient's bank and foreign taxes.

You have a right to dispute errors in your transaction. If you think there is an error, contact us within 180 days at 1-800- 934-0440 or www.camtransfer.com. You can also contact us for a written explanation of your rights at Caribbean Airmail, Inc, 9425 SW 72ND ST Suite 249 Miami Florida 33173.

You can cancel for a full refund within 30 minutes of payment, unless the funds have been picked up or deposited. Caribbean Airmail, Inc. does not disclose any non public personal

information about you, except as permitted by law. A USD 1.50 BRH Regulatory fee will be deducted from the recipient

amount if the payout location is Haiti.

CAM is not responsible for non delivery transfer if there is an error in the destination address provided by the sender.

By signing this receipt, you are acknowledging that, in relation to the transaction above, it reflects the information you provided, you paid the amount displayed on the receipt, and you understand and accept the terms and conditions.

Moun kap resevwa transfè a ka resevwa mwens lajan akòz frè chaje pa bank moun kap resevwa a plis taks peyi a letranje.

Ou gen dwa pou diskite erè ki fèt nan transfè ou a. Si ou panse ke gen yon erè, ou gen 180 jou pou kontakte nou nan 1-800-934-0440 oswa nan www.camtransfer.com. Ou kapab tou kontakte nou pou yon explikasyon alekri sou dwa ou yo nan adrès sa a: Caribbean Airmail, Inc. 9425 SW 72nd St Suite 249 Miami Florida 33173.

Ou ka anile transfé a nan 30 minit apre ke li fin fèt e yap remèt ou tout lajan an sof si transfè a gentan peye ou depoze nan bank ou. Caribbean Airmail, Inc. pa met piblik nenpòt ki enfòmasyon pèsonèl sou ou , eksepte jan lalwa pèmèt sa .

Yon USD 1.50 regilasyon frè BRH ap retire nan kantite lajan moun kap resevwa a si transfè a pwale an Ayiti.

CAM pa responsab pou transfè ki pa livre si gen yon erè nan adrès destinasyon ke expeditè a bay.

Depiw siyen resi sa a ou dako ke se enfomasyon ou te bay yo ki ladanl, ke se kob ou peye a ki nan resi a, e ke ou aksepte e konpran tèm ak kondisyon yo.

For questions and complaints about Caribbean Airmail, Inc., contact / Pou kesyon ak plent sou CAM, Caribbean Airmail, Inc. kontakte :

FLORIDA (850) 435-7352

Consumer Financial Protection Agency Bureau 855-411-2372 855-729-2372 (TTY/TDD) www.consumerfinance.gov

Agent Signature / Siyati Ajan a

Sender Signature / Siyati Expeditè a

Case 1:18-cv-07340-LDH-PK Document 65-1 Filed 06/26/19 Page 31 of 53 PageID #: 711



RECEIPT

TRACKING NUMBER 39497000

Wireless Palace.Inc

13744 NW 7th Ave

MIAMI, FLORIDA USA 33168

(305) 687-4487

Date:

HAITI/AYITI

[Pick-Up/Pikup]

1/29/2018 9:54:00AM

EXPECTED PAYOUT LOCATION/ KOTE YO

TellerID:

KA PRAN TRANSFE A:

7819

SENDER / EXPEDITE

MARGARETTE JULMISTE

331 NW 148 ST

Miami, FI 33168 7862855367

RECIPIENT /MOUN KAP RESEVWA:

ASNER BAPTISTE

PICK UP

CAP-HAITIEN, HAITI

50946910712

DATE AVAILABLE / DAT DISPONIB:

TRANSFER AMOUNT / KANTITE LAJAN: TRANSFER FEES / FRÈ

TRANSFER TAXES / TAKS

TOTAL / TOTAL:

EXCHANGE RATE / TO POU CHANJE LAJAN:

USD 1.00 = USD 1.00

TO BE PAID/ POU PEYE

AMOUNT TO BE PAID / :LAJAN POU PEYE

OTHER FEES / LOT FRE:

TOTAL TO RECIPIENT/ TOTAL:

1/29/2018 \$101.50

\$8.00

0.00

\$109.50

\$US 100.00

0.00

\$US 100.00

C.A.M. is Licensed as a Money Transmitter by CT, DC, FL, GA, IL, MA, NJ, NY, RI, Banking Departments. License # 52117

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You can cancel for a full refund within 30 minutes of payment, unless the funds have been picked up or deposited.

Caribbean Airmail, Inc. does not disclose any non public personal information about you, except as permitted by law.

A USD 1.50 BRH Regulatory fee will be deducted from the recipient amount if the payout location is Haiti.

CAM is not responsible for non delivery transfer if there is an error in the destination address provided by the sender.

By signing this receipt, you are acknowledging that, in relation to the transaction above, it reflects the information you provided, you paid the amount displayed on the receipt, and you understand and accept the terms and conditions.

Moun kap resevwa transfè a ka resevwa mwens lajan akòz frè chaje pa bank moun kap resevwa a plis taks peyi a letranje.

Ou gen dwa pou diskite erè ki fèt nan transfè ou a. Si ou panse ke gen yon erè, ou gen 180 jou pou kontakte nou nan 1-800-934-0440 oswa nan www.camtransfer.com. Ou kapab tou kontakte nou pou yon explikasyon alekri sou dwa ou yo nan adrès sa a: Caribbean Airmail, Inc. 9425 SW 72nd St Suite 249 Miami Florida 33173.

Ou ka anile transfé a nan 30 minit apre ke li fin fèt e yap remèt ou tout lajan an sof si transfè a gentan peye ou depoze nan bank ou. Caribbean Airmail, Inc. pa met piblik nenpôt ki enfômasyon pèsonèl sou ou , eksepte jan lalwa pèmèt sa .

Yon USD 1.50 regilasyon frè BRH ap retire nan kantite lajan moun kap resevwa a si transfè a pwale an Ayiti.

CAM pa responsab pou transfè ki pa livre si gen yon erè nan adrès destinasyon ke expeditè a bay.

Depiw siyen resi sa a ou dako ke se enfomasyon ou te bay yo ki ladanl, ke se kob ou peye a ki nan resi a, e ke ou aksepte e konpran tèm ak kondisyon yo.

For questions and complaints about Caribbean Airmail, Inc., contact / Pou kesyon ak plent sou CAM, Caribbean Airmail, Inc., kontakte :

FLORIDA State Regulatory (850) 435-7352

Consumer Financial Protection Agency Bureau 855-411-2372 855-729-2372 (TTY/TDD)

Agent Signature / Siyati Ajan a

Sender Signature / Siyati Expeditè a

Case 1:18-cv-07340-LDH-PK Document 65-1 Filed 06/26/19 Page 32 of 53 PageID #: 712



RECEIPT TRACKING NUMBER 43470393

Wireless Palace.Inc

13744 NW 7th Ave

MIAMI, FLORIDA USA 33168

(305) 687-4487

11/3/2018 3:48:00PM 7819 TellerID:

SENDER / EXPEDITE

RECIPIENT /MOUN KAP RESEVWA:

EXPECTED PAYOUT LOCATION/ KOTE YO

MARIE ALISE MARCELIN

KA PRAN TRANSFE A:

ODILON CELESTIN 13020 NW 12TH AVE

HAITI/AYITI

North Miami, FLORIDA 33168

PICK UP

[Pick-Up/Pikup]

Date:

CAP-HAITIEN, HAITI

7862713210

50933133719

11/3/2018

TRANSFER AMOUNT / KANTITE LAJAN:

DATE AVAILABLE / DAT DISPONIB:

\$101.50

TRANSFER FEES / FRÈ TRANSFER TAXES / TAKS \$8.00 0.00

TOTAL / TOTAL:

\$109.50

EXCHANGE RATE / TO POU CHANJE LAJAN: USD 1.00 = USD 1.00

TO BE PAID/ POU PEYE

AMOUNT TO BE PAID / :LAJAN POU PEYE

\$US 100.00

OTHER FEES / LOT FRE:

0.00

TOTAL TO RECIPIENT/ TOTAL:

\$US 100.00

C.A.M. is Licensed as a Money Transmitter by CT, DC, FL, GA, IL, MA, NJ, NY, RI, Banking Departments. License # 52117

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A USD 1.50 BRH Regulatory fee will be deducted from the recipient amount if the payout location is Haiti.

CAM is not responsible for non delivery transfer if there is an error in the destination address provided by the sender.

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Moun kap resevwa transfè a ka resevwa mwens lajan akòz frè chaje pa bank moun kap resevwa a plis taks peyi a letranje.

Ou gen dwa pou diskite erè ki fêt nan transfè ou a. Si ou panse ke gen yon erè, ou gen 180 jou pou kontakte nou nan 1-800-934-0440 oswa nan www.camtransfer.com. Ou kapab tou kontakte nou pou yon explikasyon alekri sou dwa ou yo nan adrès sa a: Caribbean Airmail, Inc. 9425 SW 72nd St Suite 249 Miami Florida 33173.

Ou ka anile transfé a nan 30 minit apre ke li fin fèt e yap remèt ou tout lajan an sof si transfè a gentan peye ou depoze nan bank ou. Caribbean Airmail, Inc. pa met piblik nenpôt ki enfômasyon pèsonèl sou ou, eksepte jan lalwa pèmèt sa.

Yon USD 1.50 regilasyon frè BRH ap retire nan kantite lajan moun kap resevwa a si transfè a pwale an Ayiti.

CAM pa responsab pou transfè ki pa livre si gen von erè nan adrès destinasyon ke expeditè a bay.

Depiw siyen resi sa a ou dako ke se enfomasyon ou te bay yo ki ladanl, ke se kob ou peye a ki nan resi a, e ke ou aksepte e konpran tèm ak kondisyon vo.

For questions and complaints about Caribbean Airmail, Inc., contact / Pou kesyon ak plent sou CAM, Caribbean Airmail, Inc, kontakte:

FLORIDA State Regulatory (850) 435-7352

www.stateofflorida.com

Consumer Financial Protection Agency Bureau 855-411-2372 855-729-2372 (TTY/TDD)

www.consumerfinance.gov

Agent Signature / Siyati Ajan a

Sender Signature / Siyati Expeditè a



1-800-934-0440

RECEIPT

CBA MANAGEMENT FLATBUSH

668 FLATBUSH AVE

BROOKLYN, NEW YORK USA 11225

7184624900

TRACKING NUMBER

45469313

Date:

3/9/2019 12:00:00 PM

TellerID:

HA66USER190

SENDER/EXPEDITE

FRITZ BEAUTE

1809 BEVERLEY RD APT 4 W

BROOKLYN, NEW YORK 11226

Tel: 3479843207

RECIPIENT/MOUN KAP RESEVWA

JEAN PIERRE GUY ELIASSON

MARCHAND DESSALINES

ST MARC, 75

Tel:36557889

EXPECTED PAYOUT LOCATION/ KOTE YO KA PRAN

TRANSFE A:

HAITI/AYITI

HAITI PICKUP IN \$US

DATE

AVAILABLE /

DAT 3/9/2019

DISPONIB:

TRANSFER

AMOUNT /

KANTITE

LAJAN:

TRANSFER.

FEES/ FRÈ:

\$8.00

\$201.50

TRANSFER TAXES/

TAKS:

\$.00

TOTAL

\$209.50

EXCHANGE RATE/TO POU CHANGE LAJAN

USD 1.00 = USD 1.00



1-800-934-0440

RECEIPT

CBA MANAGEMENT FLATBUSH

668 FLATBUSH AVE

BROOKLYN, NEW YORK USA 11225

71840_4900

TRACKING NUMBER

45469344

Date:

3/9/2019 12:00:00 PM

TellerID:

HA66USER190

SENDER/EXPEDITE

MARIE LOURDES ST JEAN

1809 BEVERLEY RD

BROOKLYN, NEW YORK 11226

Tel: 9173452817

RECIPIENT/MOUN KAP RESEVWA

CLATRE MICHELLE CHARLES

PICK-UP

JT MARC, /L

Tel:46020209

EXPECTED PAYOU! LCATION/ KOTE YO KA PRAN

TRANSFE A:

HAITI/AYITI

HAITI PICKUP IN \$US

DATE

AVAILABLE /

DAT

3/9/2019

DISPONIB:

TRANSFER

AMOUNT /

KANTITE

LAJAN:

\$101.50

TRANSFER

FEES/ FRÈ:

\$8.00

TRANSFER

TAXES/

\$.00

TAKS:

TOTAL

\$109.50

EXCHANGE RATE/TO POU CHANGE LAJAN

USD 1.00 = USD 1.00

TO BE PAID



1-800-934-0440

RECEIPT

Nanabelle Event Planner & Multiservices

14220 NW 7TH AVE MIAMI, FLORIDA USA 33168

7865066087

TRACKING NUMBER 45192073

Date:

2/22/2019 11:28:00 AM

TellerID: NAEV3992USER

SENDER/EXPEDITE

JEANNETTE VALEUS

13804 NW 7TH AVE

MIAMI, FLORIDA 33168

Tel: 7864889773

RECIPIENT/MOUN KAP RESEVWA

LEONA VALEUS

PICK UP

PORT DE PAIX, 75

Tel:36194754

EXPECTED PAYOUT LOCATION/ KOTE YO KA PRAN

TRANSFE A:

HAITI/AYITI

HAITI PICKUP IN \$US

DATE

AVAILABLE / 2/22/2019

DISPONIB:

TRANSFER

AMOUNT /

KANTITE

\$61.50

LAJAN:

TRANSFER

FEES/ FRÈ:

\$5.40

TRANSFER

T. IXES/ TAKS:

\$.00

TOTAL

\$66.90

EXCHANGE RATE/TO POU CHANGE LAJAN

USD 1.00 = USD 1.00

TO BE PAID **POU PEYE**

AMOUNT TO

PAID/LAJAN

\$60.00

POU PEYE:

TRANSFER

TAXES/ TAKS:

\$.00



RECEIPT/RI C. 30 Thank you/Gracias

TRACKING MUMBER (MTCN)/ NO. DE CON MOL DEL ENVIO: 851-348-0070

For Customer Service 1 3 and 1 800-325

6000/Para come at an el servic. itención al

My VVU® #707274847 Total Points/Puntos totales 90

ATN CHECK CASHING #1 1221 I GUY R BREWER BLVD, NY

Money Transfer/Envio de Din aro. CASH/Dinero en efectivo

Operator (D/Mo ID del Operador I)cq

Date of Transactions/Fecha de las Transacciones. April 13, 2019/Abril 13, 2019

Time of Transactions/Hora de las Transacciones 01:21 PM EDT

Sendar/Remitente: ODILON CELESTIN 13640 NW 2 AVE, NORTH MIAMI, FL, 33168, USA 7862713210

Final Receiver/Destinatano Final LAMARE BEAULIEU . .

Expected Foreign Country Payout Location/Localidad donde Esperan el Pago en país extranjero: Haiti/HaitI

Service Type/Tipo de Servicio MONEY IN MINUTES/DINERO EN MINUTOS

Date Avaitable in Final Receiver's Country/Fecha Disponible en el País del Destinatano Final. April 13, 2015 - bail 13, 2019

Transfer Amount/ 101.50 USD Cantidad de Envio

Transfer Fees/ + 10.00 USD Cargos por Envio:

Additional Fees/ + 0.00 USD Cargos Adicionales

Transfer Taxes/ + 0 00 USD Impuestos de Envio

Promotion Discount/ USD
Descuento Promocional : 111.50 USD

Exchange Rate/Tipo de Cambio 1 USD = 1.0000 USD

Case 1:18-cv-07340-LDH-PK Document 65-1 Filed 06/26/19 Page 36 of 53 PageID #: 716

Transfer Taxes/
Impuestos de Envio + 0 00 USD

Promotion Discount/
Descuento Promocional - USD

Total / Total 111.50 USD

Exchange Rate/Tipo de Cambio 1 USD = 1.0000. USD

Transfer Amount/ Cantidad de Envio

101.50 USD

Harti Central Bank Fee/ Cargo del Banco Central de

1.50 USD

Haiti

Total to Final Receiver/Total at Destinatario Final:

100.00 USD

For all transfers, Final Receiver may receive less due to foreign taxes. For transfers to a bank account, Final Receiver may also receive less due to fees charged by the Final Receiver's bank./Para todas las transferencias, et Destinatario Final puede recibir menos debido a los impuestos extranjeros. Para las transferencias a una cuenta bancaria, et Destinatario Final también puede recibir menos debido a las tarifas que carga et banco del Destinatario Final.

You have a right to dispute errors in your transactions If you think there is an error, contact us within 180 days of the date that we promised you that the funds would be made available to the Final Receiver at 1.800-325-6000 or

https://care.westemunion.com/us/en/ask You can also contact us for a written explanation of your rights./Usted tiene el derecho a disputar errores en su transacciones Si cree que hay un error, contáctenos dentro de 180 dias a partir de la fecha en que le prometimos que los fondos estarian disponibles para el Destinatario Final al 1-800-325-6000 o https://care.westernunion.com/us/es/ask También puede contactarmos para obtener una explicación escrita de sus derechos.

Subject to applicable law, you can cancel for a full refund within 30 minutes of payment, unless the funds have been picked up or deposited./Sujeto a la ley aplicable, usted puede cancelar el envio y recibir un reembolso total dentro de 30 minutos de haber realizado el pago, a no ser que los fondos hayan sido recogidos o depositados.

For questions or complaints about Western Union, contact /Para preguntas o presentar una queja sobre Western Union, contacte a:

New York State Department of Financial Services 1-800-342-3736 http://www.dfs.ny.gov

Consumer Financial Protection Bureau 1-855-411-2372 1-855-729-2372 TTY/TDD http://www.consumerfinance.gov

For inquiries or comments in English, please write to /Para consultas o comentarios en español, escriba a.

VVESTERN UNION P.O. Box 6036, Englewood, CO 80155

International money transfer services are provided by two Western Union companies: Western Union Financial Services, Inc. ("WUFSI") and Western Union International Services, LLC ("WUIS"). Transfer fees disclosed above for these services are charged by WUIS /Los servicios de transferencia de dinero a nivel internacional son provistos por dos compañías Western Union Western Union Financial Services, Inc. ("WUFSI") y Western Union International Services, Inc. ("WUFSI") Los contos en concepto de

RECEIPT / RECIBO

Thank You / Gracias

Tracking Number (MTCN) / NO. de Control del Envío (MTCN): 216-850-0425

For Customer Service, please call 1-800-325-6000 / Para comunicarse con el servicio de atención al cliente. Ilame al 1-800-325-6000

My WU-#/Gold Card/Tarjéta Dorada #: 123889956 Total Points / Puntos totales: 32

PAYOMATIC CORP 1908 CHURCH AVE BROOKLYN, NY, USA

Money Transfer / Envío de Dinero Cash / Dinero en efectivo

Operator ID / No. ID del Operador 611020

Date of Transaction / Fecha de transacción: March 5, 2019 / Marzo 5, 2019

Time of Transaction / Hora de la Transacción. 4:28 PM EST

Sender / Remitente: MARIE STJEAN 1809 BEVERLY RD, BKLYN, NY 11226 9173452817

Receiver / Destinatario: JEAN PAUL PIERRE ANTOINE

Expected Payout Location / Localidad donde se Espera Pago Haiti / Haiti

Service Type / Tipo de Servicio: Money in minutes / Dinero en Minutos

Date Available in Receiver's Country / Fecha Disponible en el País del Destinatario: March 5, 2019 / Marzo 5, 2019

Transfer Amount / Cantidad de Envio:

101:50 USD

Transfer Fees / Cargos por Envio:

+ 10 00 USD

Additional Fees / Cargos Adicionales:

+ 0.00 USD

Transfer Taxes /

+ 0.00 USD

Impuestos de Envio:
Promotion Discount/

Total / Total:

- 0.00 USD

Descuento Promocional

111.50 USD

Exchange Rate / Tipo de Cambio: 1.00 USD = 1 USD

Transfer Amount / Cantidad de Envio:

Receiver / Destinatario. JEAN PAUL PIERRE ANTOINE

Expected Payout Location / . Localidad donde se Espera Pago: Haiti / Haiti

Service Type / Tipo de Servicio Money in minutes / Dinero en Minutos

Date Available in Receiver's Country / Fecha Disponible en el País del Destinatario: March 5, 2019 / Marzo 5, 2019

Transfer Amount / Cantidad de Envio:

101.50 USD

Camidad do Emile

+ 10 00 USD

Transfer Fees / Cargos por Envio:

+ 0.00 USD

Additional Fees / Cargos Adic.onales:

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Transfer Taxes /

+ 0.00 USD

Impuestos de Envio

Promotion Discount/ Descuento Promocional: - 0.00 USD

Total / Total:

111.50 USD

Exchange Rate / Tipo de Cambio: 1.00 USD = 1 USD

Transfer Amount / Cantidad de Envio: 101.50 USD

Other Fees / Otros Cargos por Envio:

- 1.50 USD USD

Total to Receiver / Total al Destinatario 100.00 USD

For all transfers, Receiver may receive less due to foreign taxes. For transfers to a bank account, Receiver may also receive less due to fees charged by the Receiver's bank / Para todas las transferencias, el Destinatario puede recibir menos debido a los impuestos extranjeros. Para las transferencias a una cuenta bancaria, el Destinatario también puede recibir menos debido a las tarifas que carga su banco.

You have a right to dispute errors in your transaction. If you think there is an error, contact us within 180 days of the date that we promised you that the funds would be made available to the Receiver at 1-800-325-6000 or https://care.westernunion.com/us/en/ask. You can also contact us for a written explanation of your rights. / Usted tiene el derecho a disputar errores en su transacción. Si cree que hay un error, contáctenos dentro de 180 días a partir de la fecha en que le prometimos que los fondos estarian disponibles a el Destinatario al 1-800-325-6000 o

RECEIPT/RECIBO Thank you/Gracias

THACKING NUMBER (MTCN)/

NO DE CONTROL DEL ENVIO: 492-530-2862

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For Customer Service, please call 1-800-325-6000/Para comunicarse con el servicio de atención al cliente, llame al 1-800°325-6000

My VVU® #11964 *645 Total Points/Puntos totales: 162

PUBLIX #1094 1415 E SUNRISE BLVD, FL

Money Transfer/Envlo de Dinero: CASH/Dinero en efectivo

Operator ID/No ID del Operador 419

Date of Transaction/Fecha de Transacción. January 31, 2019/Enero 31, 2019

Time of Transaction/Hora de la Transacción. 10 48 AM EST

Sender/Remitente: ESTEVE CHARLES 5315 NW 24 CT LAUDERHILL, FL, 33313, USA 9544965520/ 9544965520 .

Receiver/Destinatario. FIONORIUS CHARLES

wices combat/No. Mobil 38733562

spected Payout Location/ Fiscalidad donde Esperan Pago: Haiti/Haiti

Service Type/Tipo de Servicio MONEY IN MINUTES" - "ERO EN MINUTOS

Date Available in Receiver Disposible enrel Pais del 5 Inatario 19

Transfer Amount/
Canlidad de Envio. 191.50 USD

Transfer Fees/
Cargos por Envio + 5 00 USD

Additional Fees/
Cargos Adicionales + 0 00 USD

Transfer Taxes/ + 0 00 USD

Promotion Discount/
Descuento Promocional: - USD

signate sumber/No. Mobil. 387.33582

spected Payout Location/ Licalidad donde Esperan Pago Haiti/Haiti

Service Type/Tipo de Servicio
MONEY IN MINUTES# TRO EN MINUTOS

Date Available in Receiver
Disponible errel País de finalario
January 31, 1019/En.

Sountry/Fecha

Transfer Amount/ 191 50 USD Cantidad de Envio:

Transfer Fees/ + 5 00 USD Cargos por Envis. + 5 00 USD

Additional Fees/ + 0 00 USD Cargos Adicionales

Transfer Taxes/ + 0 00 USD Impuestos de Envio:

Promotion Discount/
Descuento Promocional:

USD

Total / Total. 196 50 USD

Exchange Rate/Tipo de Cambio: 1 USD = 1 0000 USD

Transfer Amount/ 191.50 USD Cantidad de Envio:

Haiti Central Bank Fee/
Cargo del Banco Central de - 150 USD
Haiti

Total to Receiver/Total al 190 00 USD

For all transfers, Receiver may receive less due to foreign taxes. For transfers to a bank account, Receiver may also receive less due to fees charged by the receiver's bank /Para todas las transferencias, el Destinatario puede recibir menos debido a los impuestos extranjeros: Para las transferencias a una cuenta bancaria, el Destinatario también puede recibir menos debido a las tarifas que carga su banco.

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Receiver at 1-800-325-6000 or

Destinatario:

https://care-westernunion.com/us/en/ask. You can also contact us for a written explanation of your rights://Usted tiene el derecho a disputar errores en su transacción. Si cree que hay un error, contáctenos dentro de 180 días a partir de la fecha en que le prometimos que los fondos estarian disponibles el Destinatario al 1-800-325-6000 o https://care.westemunion.com/us/es/ask. También puede contactarnos para obtener una explicación escrita de sus derechos.

Subject to applicable laws, you can cancel for a full refund within 30 minutes of payment, unless the funds have been picked up or deposited./Sujeto a las leyes aplicables, usted puede cancelar el envio y recibir un reembolso total dentro de 30 minutos de haber realizado el pago, a no ser que los fondos hayan sido recogidos o depositados.

For questions or complaints about Western Union, contact:/Para preguntas o presentar una queja sobre Western Union, contacte a:

EXHIBIT F

Translation Transcript

JOUNAL SAN FONTYE: Michel Martelly Resi Reponn Tout Kesyon Sou Kob La/Martelly Finally Answered questions Regarding the Money

Jounal San Fontye

(0:10:54-0:13:16):

Now on the issue of education, which was your trojan horse. The PSUGO- Universal, Free and Compulsory Education Programme issue, there are a lot of complaints about it. Are you satisfy with it how you left it as compared to how you found it?

MM:

Once again, something I attempted to do all by myself. It was already a precarious situation while I was doing it. Once I left office, they abandoned it. It was precarious to begin with because I came with a system whereby the government was paying for school and there were a lot of people making money off the back of the government. People who own schools with only 100 students were reporting 300 hundred to the government. When you go to audit them, visit with them while researching them that is when you realized that they lied. It took us a long time to realize how much money was stolen and how many people were involved in the theft. Within the government, we identified a school principal in the north west who worked for the Department of Education who was stealing money as well. Did I succeed? I can say that I did not get the support from the press, or the civil society, or the masses. Excuse me for saying, the free school program was for whom? It was for the masses. The same way the masses used to protest against the opposition or against this and that, against the president or for the president. I thought for the free school program, the masses could have protested and demanded its preservation or that it is made better because the idea was a good one. It pertains to the future of our children. Let us defend the idea. Nope, such a position was never taken. The only thing you hear about is the \$1.50 and \$0.05 cents. That we stole the \$1.50 and the \$0.05 cents from the phone calls. Those funds did not go to any particular individual. They went straight to institutions such as BRH. At any given time, an organization or individual wants to hold the government accountable, go and ask ULCC to look into how much money is collected, what did they do with the money, and where did the money go.

JSF:

The public was waiting for you to sanction those accused of wrong doings.

MM:

You find corruption at all level. In our society a gangster has more

clout than a police officer.

JSF:

Seriously?

MM:

Yes, I personally witnessed on many occasions where they would arrest a gangster and he would be released immediately; and I have witnessed on many occasions where policemen would fall victim,

yet no one bothered to assist them.

Link: https://youtu.be/YjPDAuTBhSI?

I, Daniel Dume-Charles, hereby certify that I translated the attached document-video from Haitian into English and that, to the best of my ability, it is a true and correct translation. I further certify that I am competent in both French and English to render and certify such translation.

Daniel Dume-Charles, Translator

Sworn to before me this 7th day of June 2019.

Notary Public

MARCEL P. DENIS

NOTARY PUBLIC, STATE OF NEW YORK

Registration No. 02DE6365279

Qualified in Kings County

Commission Expires October 2, 2021

EXHIBIT G

I, Daniel Dume-Charles, hereby certify that I translated the attached document from Haitian into English and that, to the best of my ability, it is a true and correct translation. I further certify that I am competent in both French and English to render and certify such translation.

Daniel Dume-Charles, Translator

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EXHIBIT H

Translation Transcript

ANTRE NOUS-TRIPOTAY LAKAY

Host:

There are several things you said that I am not going back to. Let me ask you Mrs. Orion, one of the issues that people in the diaspora have concerned the \$1.50. \$1.50 that are collected on every money transfer to Haiti go directly to finance education in Haiti. However, the \$1.50 represents a slush fund for many people because no light is shed on it. Nobody knows how much money is collected. Or what the money is being used for? Can you levy taxes without a law on that matter? How much money does the government receive every year from the diaspora with the \$1.50 collection?

Mrs. Orion:

Listen, when you asked me how much money comes in every year? I am going to tell you. What is the \$1.50? Every money transfer is subjected to an additional \$1.50.

Host:

That we know, we know it far too well.

Mrs. Orion:

One second, the \$1.50 are collected by the BRH which in turn deposit them in the account of the FNE. Every time someone places a call to Haiti, they charge them roughly \$0.50 per minute and that are collected by CONATEL from the local phone companies, we are talking about Natcom and Digicel. Once CONATEL collects that money based on the signed protocol, that money is deposited with BRH for the account of the FNE, or what we call the government's account or what we call Public Fund. You asked me how much money is collected from the time that they began to collect the \$1.50 to date?

Host:

Non, I asked you how much money is collected every year?

Mrs. Orion:

I cannot tell you how much money is collected every year. But I can tell you that from July 2011 to July 2018, I am talking about the fees, CONATEL collected 7.624 billion Gourdes that they deposited in the account. It is with that money that they built schools and pay the PSUGO and so on. It is the same thing for BRH. BRH collected till last October about 1.446 billion gourdes. That is the amount that BHR collected from October 2017 to October 2018. You are talking about the \$1.50 that are collected from the diaspora; this is what the money does: first, it pays the salary of teachers enrolled in the PSUGO, which has since stopped because it was carried out through the public-school system. As I told you earlier, the central government pays 400 gdes per child comes from that money. We also use the money to rehabilitate schools. We also use the money

to reinforce the free lunch program in the public schools. All that is done through the law enacted to regulate the FNE. Soon, there will be a Presidential Order naming a chairman for the FNE together with a governing board.

Host: You said a law regulating the FNE, when was that law enacted and

when was it published?

Mrs. Orion:

The law on FNE was enacted during Jovenel Moise's presidency and published in the Moniteur. It is a law that has been in the parliament since President Martelly. That law was still in the parliament during the interim government. Now, it has been enacted and published in the official newspaper the Moniteur. It is because of that law that the PSUGO is no longer in the hands of the private sector, whereas only private schools were benefiting from the program. Nowadays, the PSUGO is being handled through the public school's system. It is because of the FNE law, which is

segment taken from a 28 minutes and 26 seconds interview.)

National Education Funds. (This clip is a 4 minutes and 21 seconds

https://youtu.be/X4j6QsGzq 8 -Madame Aurion contradicting the government's report.

I, Daniel Dume-Charles, hereby certify that I translated the attached document-video from Haitian into English and that, to the best of my ability, it is a true and correct translation. I further certify that I am competent in both French and English to render and certify such translation.

Daniel Dume-Charles, Translator

Sworn to before me this 7th day of June 2019.

Notary Public

MARCEL PEDEMIS

MARCEL PEDEMIS

OTARY PUBLIC, STATE OF NEW YORK

Registration No. 02DE6363279

Qualified in Kings County

Commission Expires October 2, 2021

EXHIBILI

Translation Transcript

Kote lajan \$150 yo pran sous diaspora a, Prezidan Jovenel Moise ap di konbyen kòb li ye,sa yo rê-Where is the \$1.50 taken from the diaspora, President Jovenel Moise explains how much money it is and what have the government done with it.

Tripotay Lakay: \$1 that they came out of money taken from the diaspora, \$1.50 on phone calls ect... The diaspora spoke about it a great deal. In fact, they want me to ask you question about 117, 000,000 dollars that are already been disbursed out of the funds. Do you have any idea how such funds were spent and what have been done with such funds considering that the public is yet to see any real results?

government is yet to have the means to put them to school. To put them to school, we need to build are 500,000 more children who need to go to school and cannot go to school because the additional funding because there are 500,000 children more that we need to put to school. There 750,000 children attending primary school from 1st through 6th grades. We are still looking for throughout the country. No body stole your money. Your money went to educate 750, 000 children, doing. Diaspora, your money today is being used to provide free education to 750,000 children information on the website of his department so the diaspora can see the work that their money is I asked the Minster of Education, who is watching and listening to me now, to publish such shortage, the government hired independent contractors to teach. All this information is verifiable. payment regularly. There was a shortage of teachers on the primary school level. To meet such a are receiving free education. The children supposed to pay \$4.80, the government assumed such a I did not know, I cannot say for how many years but since I became president 750,000 children done with the funds. There are 750,000 children attending public schools throughout the country. funds, \$1.50 and a whole lot of money on phone calls and I heard nothing about what they have with the Minister of Education and posed the question to him. I asked him what happened to the education program. I must tell you, it is not because I was coming to your programming that I met that the population at large is unaware of. I, myself, did not have any information about the free It is because there is a lack of communication, there is a lot of things going on in the country

Tripotay Lakay: Have you started building?

15,000 classrooms that will cost the government 400,000,000 dollars.

JM: Yes, we already started. We already started building. We have already built 36 schools. I heard a question like that from the delegation that went to New York. I did not see the answer. But there are schools that are being build. We rehabilitated all the schools that were destroyed.

translation, I further certify that I am competent in both French and English to render and certify such Haitian into English and that, to the best of my ability, it is a true and correct translation. I, Daniel Dume-Charles, hereby certify that I translated the attached document from

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